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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

COURTNEY TAMAGNY AND
JEANNE TAMAGNY

Plaintiffs,

-vs-

DIVISION OF CHILD PROTECTION
ET AL.

Defendants

Hon. Susan D Wigenton, USDJ
Hon. Cathy L. Waldor, USMJ

CASE NO.: 2:25-cv-00732

NOTICE OF MOTION FOR LEAVE
TO FILE SECOND AMENDED
COMPLAINT

PLEASE TAKE NOTICE that on August 4, 2025 or at such time as the Court so designates, counsel for Plaintiffs in the above-matter shall move the Court for an Order granting Plaintiffs leave to file a Second Amended Complaint pursuant to Federal Rules of Civil Procedure, to add and identify a party Defendant who is an agent of the Defendant Bergen County Prosecutors Office.

PLEASE TAKE FURTHER NOTICE, that in support of the within motion, Plaintiffs shall rely upon the Certification of Demetrios K. Stratis, Esq., and the form of the Second Amended Complaint attached thereto, and the Brief submitted herewith.

PLEASE TAKE FURTHER NOTICE, that oral argument is not requested unless opposition is filed hereto.

DATED: July 9, 2025

Respectfully submitted,

s/ Demetrios K. Stratis
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